

UNITED STATES BANKRUPTCY COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	NO. 24-03264-HWV
Irene Papoutsis Mulkerin	:	
	:	
Debtor	:	Chapter 7

CHAPTER 7 TRUSTEE'S OBJECTION TO DEBTOR'S MOTION  
TO COMPEL PRODUCTION OF DOCUMENTS

AND NOW, comes the Trustee, by his attorney, Steven M. Carr, Esquire, of the law firm of Ream, Carr, Markey & Woloshin, LLP, and files this Objection of which the following is a statement:

1. Objector is the duly appointed Trustee in the above-captioned Bankruptcy.
2. Debtor seeks to compel production of documents of the Family Limited Partnership of which she is a limited partner and to compel Trustee to take action in furtherance of that request.
3. Debtor acknowledges that the FLP Interest is property of the bankruptcy estate and within the exclusive control of the Trustee, but insists a basis to “end run” that by asserting a need to file tax returns.
4. Debtor’s basis is pretextual; she is fully capable of filing returns based upon the K1s provided to her.
5. Debtor's Motion invades and interferes with the Trustee's exclusive control of the asset.
6. Further, it is probable that the asset will be abandoned at which point control over the asset will revert in Debtor and Debtor will be able to pursue her State Court remedies. Thus, her motion is premature.

WHEREFORE, Chapter 7 Trustee prays that the Motion to be denied.

Ream, Carr, Markey Woloshin & Hunter, LLP

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